

Cushing Public Schools has already used some or all of our E-Rate Category 2 allotment for the following items: new 10 Gig switches across the entire district, expanded Wi-Fi coverage in weak coverage areas, cabling to new access points, and enhanced Wi-Fi coverage in areas to carry the appropriate student load. The connectivity provided by these Category 2 items has improved our school or district's educational experience in the following ways: ability to support modern learning platforms, methods, and theories; allow our students to have devices which will work almost anywhere in our buildings; and enhance student learning in countless other measures. If schools were to lose E-Rate Category 2 funding across the now covered categories it would be a huge blow to schools. Many schools are already struggling to get by and by ripping away something that can help them as much as discounting the cost of getting adequate networks to support the modern bandwidth requirements is a huge disappointment to schools nationwide. We have already faced the loss of E-Rate funding on phone service, websites, certain server types (DHCP), and much more. If anything should be done it would be looking at how the funds are used in the large urban school districts vs smaller rural districts. We are calculated on the same formula, but when you have a building that has 500 students the same building in a large metropolitan area could house twice that many. When the calculation comes down it then turns into approximately \$150/student x number of students and would give the larger district \$150,000 and the smaller district only \$75,000. With this example the district's needs would be very similar in terms of Wi-Fi coverage and Category 2 needs, but the smaller district only has half the money to cover cabling, access points, switching, firewalls, etc. Unfortunately with the way E-Rate is structured we are all on the same stage simply because of population and demographics. It would be a huge detriment if the FCC and USAC were to strip away more from schools and libraries through removing even more from the Category 2 allotment just to inject funds into telemedicine and lifeline (which is known to be ridden with fraud and abuse). The GAO has even published an article regarding a few of the lifeline problems which even states "\$1.2 million could have resulted from potentially ineligible or fictitious individuals receiving Lifeline benefits." (United States Government Accountability Office, 2017) This figure represents a hole which is attempted to be filled with a shovel that will only make the hole larger.

Works Cited

United States Government Accountability Office. (2017). *Additional Action Needed to Address Significant Risks in FCC's Lifeline Program*. United States Government Accountability Office.

<https://www.gao.gov/assets/690/684974.pdf>